

May 16, 2016

**UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF CALIFORNIA**

**Request for Modifying the Conditions of Pretrial Release**

**Name of Defendant:** Allison Gill

**Dkt No.:** 16CR0089-WQH

**Name of Judicial Officer:** The Honorable William Q. Hayes, U.S. District Judge (referred to the Honorable Jill L. Burkhardt)

**Date Conditions Were Ordered:** December 22, 2015, before the Honorable Jill L. Burkhardt, U.S. Magistrate

**Conditions of Release:** *Mandatory Conditions* - not commit a federal, state, or local crime during the period of release, and make all court appearances. *Standard Conditions* - travel restricted to the Southern District of California; do not enter Mexico; report for supervision to Pretrial Services Agency (PSA) as directed by the assigned Pretrial Services Officer and pay for reasonable costs of supervision in an amount determined by PSA and approved by the Court; not possess or use any narcotic drug or other controlled substance as defined in 21 U.S.C. Section 802, without a lawful medical prescription; and not possess any firearm or other dangerous weapon or explosive device during the pendency of the case; read or have explained, and acknowledge understanding of the Advice of Penalties and Sanctions Form; provide a current residence address and phone number prior to release and keep it current while case is pending; actively seek and maintain full-time employment, schooling, or a combination of both; reside at residence approved by Pretrial Services; and defendant to surrender any valid passport and may not apply for new travel documents.

**Modification:** None

**Date Released on Bond:** December 23, 2016

**Charged Offense:** Title 21, U.S.C., Section 952 and 960 - Unlawful Importation of a Controlled Substance

**Next Court Hearing:** July 11, 2016, at 2:00 PM for a Motion in Limine Hearing before the Honorable William Q. Hayes.

**Asst. U.S. Atty.:** Janaki Ghandi  
(619) 546-8817

**Defense Counsel:** Dana Grimes (Retained)  
(619) 232-9700

**Prior Violation History:** None

PS 8B  
(05/08)

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**PETITIONING THE COURT**

**TO MODIFY THE CONDITIONS OF SUPERVISION AS FOLLOWS:**

PRAYING THE COURT WILL ORDER THE DEFENDANT TO SUBMIT TO TREATMENT AT THE DISCRETION OF PRETRIAL SERVICES FOR PSYCHIATRIC OR PSYCHOLOGICAL COUNSELING.

**CAUSE**

On May 9, 2016, the Ms. Gill appeared in the Pretrial Services office and indicated she would like receive mental health counseling. Ms. Gill advised she has been feeling depressed since the age of twelve (12) and last sought treatment one (1) year ago. Ms. Gill denied having any current suicidal ideation.

Pretrial Services contacted Ms. Gill's sureties, Wayne Gill, Leslee Gill, her attorney, Dana Grimes, as well as the Attorney for the United States, Janaki Ghandi, to inquire as to their position regarding modifying the conditions of release to include mental health counseling. The sureties, Ms. Grimes, and Ms. Ghandi indicated they do not oppose this condition.

Pretrial Services has been monitoring the defendant's mental health and has offered counseling to the Ms. Gill on numerous occasions. Ms. Gill has previously preferred to treat her mental health condition with prescribed medications. In light of the fact Ms. Gill has requested counseling, Pretrial Services respectfully recommends conditions of release be modified to include treatment at the discretion of Pretrial Services for psychiatric or psychological counseling.

**I declare under penalty of perjury that the foregoing is true and correct.**

**Executed on:** May 16, 2016

Respectfully submitted:

Reviewed and approved:

by \_\_\_\_\_  
Marisa Zvers  
United States Pretrial Services Officer  
(619) 446-3616  
San Diego, California

\_\_\_\_\_  
Jeff Larsen  
Supervising U.S. Pretrial Services Officer

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## THE COURT ORDERS:

X **AGREE, MODIFY THE DEFENDANT'S CONDITIONS OF RELEASE TO INCLUDE THAT THE DEFENDANT SUBMIT TO TREATMENT, AT THE DISCRETION OF PRETRIAL SERVICES, FOR PSYCHIATRIC OR PSYCHOLOGICAL COUNSELING.**

\_\_\_\_\_ Other \_\_\_\_\_

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The Honorable Jill L. Burkhardt  
U.S. Magistrate Judge

May 16, 2016

Date \_\_\_\_\_